

# GHAJAR EXHIBIT 47

12/5/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
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Thomas Scialom, Ph.D.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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RICHARD KADREY, et al., :

Plaintiffs, :

v. :

Case No.: 3:23-CV-03417-VC

META PLATFORMS, INC., :

Defendant. :

-----x

HIGHLY CONFIDENTIAL, ATTORNEYS' EYES ONLY

Videotaped Deposition of

THOMAS SCIALOM, Ph.D.

Thursday, December 5, 2024

9:14 a.m. GST

London, England

Reported by: Cassidy Western, RPR, CRR

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1 A Research scientist.

2 Q Scientist. I'm sorry.

3 And how many other research scientists  
4 were there at the lab with you?

5 A In my team?

6 Q Yes.

7 A I was the only one.

8 Q Okay. And did you work within the  
9 American team as well as -- with their research  
10 scientists?

11 A I mean, we had some interaction, some  
12 brainstorming, some exchange of ideas. But the  
13 core team was in Europe, with probably less than  
14 10 people, I will say. And -- so not with  
15 American people.

16 Q Okay. Over the years, you had to start  
17 in a matter as -- today, we're talking about the  
18 LLaMA program, right? And it's different for  
19 LLaMA 1, LLaMA 2, LLaMA 3. But we're talking  
20 about all that -- how do you want me to refer to  
21 that? Is that -- that's all the GenAI program?  
22 Is that fair to say?

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1 MR. MORTON: Objection to form.

2 THE WITNESS: No, I don't think it's

3 fair to say. I mean, I didn't contribute to

4 LLaMA 1, and it was much before GenAI.

5 BY MR. BYRD:

6 Q Okay.

7 A LLaMA 2 started, actually, before GenAI

8 as well.

9 Q So why don't -- so we're talking about

10 LLaMA 2 and later, as far as you're concerned,

11 today. Right?

12 A Yeah.

13 Q And at some point when you -- when you  
14 started working at Meta, you had to sort of  
15 interact with some of the scientists in the United  
16 States. Right?

17 A What -- what -- say again?

18 Q You have to interact with the  
19 scientists. We see a lot of chats. You do  
20 messaging and all that back and forth from France  
21 to the scientists that are working in America?

22 A But you refer when I started at Meta or

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1 getting -- I guess now you'll be going to grade  
2 eight. Is there a grade eight? Because that  
3 would have been in July. Have you been promoted  
4 in the middle of 2024?

5 A No, but the first time.

6 Q For the first time, you weren't  
7 promoted?

8 A Yes.

9 Q Okay. And why not?

10 A First of all, I think, like, it's not  
11 something to expect, to be promoted every six  
12 months. I mean, why not? I'll let you ask my  
13 manager, but...

14 Q There are higher grades, though. Right?

15 A My manager is eight, yes.

16 Q Okay. All right.

17 And that's where you are today, and  
18 you're a research scientist and you're grade  
19 seven. Is that right?

20 MR. MORTON: Object to form.

21 THE WITNESS: I'm research scientist,

22 grade seven.

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1 more tokens?

2 A If they are good tokens. In the sense,  
3 that was the point of Galactica, to show that it's  
4 not the case and you don't need actually, to get a  
5 good model, a lot of tokens, if they are good.

6 Q Right.

7 What other data -- are you aware of  
8 there being any books in LLaMA 2 or the LLaMA 3  
9 pretraining?

10 A If I'm aware of any books in the  
11 pretraining? I don't know.

12 Q Okay.

13 A I don't recall or -- but I don't know  
14 the context -- the list of the datasets in the  
15 pretraining, I don't know.

16 Q Okay. Have you ever done any  
17 post-training work to address any type of  
18 copyright violations or infringements that may be  
19 at risk?

20 MR. MORTON: Object to form. Caution  
21 the witness to the extent reveal any legal  
22 communications.

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1 If you can answer without --

2 BY MR. BYRD:

3 Q Yeah. I never want to know about your  
4 attorney's legal --

5 MR. MORTON: Yeah.

6 BY MR. BYRD:

7 Q -- communications.

8 A No, but let me think. I recall, at the  
9 end of LLaMA 2, some mitigation, yes.

10 (Indiscernible.)

11 Q And what was that mitigation?

12 A We received, basically, a list of prompt  
13 and answer, just the same way I describe it for  
14 safety before. It was connected, for instance,  
15 to, tell me -- write a book of "Harry Potter",  
16 for instance. And the answer was, I cannot answer  
17 this question.

18 And so it was just a list of prompt and  
19 answers that, just for safety, you want to educate  
20 the model to not answer.

21 Q And you did that. Right?

22 MR. MORTON: Object to form.

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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC  
2 I, CASSIDY WESTERN, RPR, CRR, the officer  
3 before whom the foregoing deposition was taken, do  
4 hereby certify that the foregoing transcript is a  
5 true and correct record of the testimony given;  
6 that said testimony was taken by me  
7 stenographically and thereafter reduced to  
8 typewriting under my direction; that reading and  
9 signing was requested; and that I am neither  
10 counsel for, related to, nor employed by any of  
11 the parties to this case and have no interest,  
12 financial or otherwise, in its outcome.  
13 IN WITNESS WHEREOF, I have hereunto set  
14 my hand this 10th day of December, 2024.  
15 My commission expires August 4, 2025.

16

17

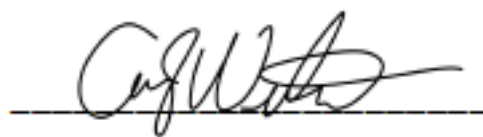
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Cassidy Western, RPR, CRR

12/10/24

Date